

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)

Federal-State Joint Board on)
Universal Service)

CC Docket No. 96-45

Access Charge Reform)

CC Docket No. 96-262

REPLY COMMENTS OF SPRINT CORPORATION

Sprint Corporation ("Sprint"), on behalf of its local, long distance and wireless divisions, submits its replies to comments filed on July 23, 1999 in the above-captioned matter.

INTRODUCTION

The issues staked out in the comments have, for the most part, been discussed, debated and dissected from every conceivable angle. Sprint shall, therefore, limit its replies to a very few comments that it believes go completely beyond the pale.

Sprint first reiterates its position on the most basic issues being considered by the Commission:

1. Sprint believes that it is imperative, in order to preserve competitive neutrality, that the Commission expressly order that local exchange companies are prohibited from recovering universal service fund ("USF") contributions through carrier access charges.
2. Sprint advises against the inclusion of wireless lines when determining a state's ability to support universal service. Wireless costs were not considered in determining the national benchmark and thus it is inappropriate to include them when assessing a state's ability to support universal service. The Commission should not take any action that would prejudice the states' decisions on the inclusion of wireless carriers as universal service contributors. It should thus reject the notion of including wireless lines when determining a state's ability to support universal service.

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3. It is vital that hold harmless be implemented as part of the federal plan. It is critical that the Commission use as a starting point existing levels of funding in order to ensure continued support to high-cost areas. Furthermore, because it is quite likely that the cost model will not be flawless upon its introduction on January 1st, it is necessary that hold harmless be in place on that date. Its mere presence will lessen significantly any concern regarding the readiness of the model. Sprint agrees that the Commission should revisit the issue in three years, once concerns about the stability of the cost model and inputs have been alleviated.
4. As Sprint has argued consistently in this docket, it is imperative that any ILEC receiving an increase in universal service support funds above its current funding levels must be required to offset that increase, dollar for dollar, though decreases in intrastate access charges.
5. The Commission should reject entirely the concept of block grants. The decision regarding the distribution of USF dollars must be made prior to the disbursement of the fund and not be left to a matter discretion after the fact. Neither the Act nor its legislative history contain any evidence to suggest that Congress intended a change in the manner in which USF dollars are dispensed. Funds should be directed to the relevant carrier based on the supported services provided by that carrier.
6. The Commission should calculate cost on the basis of wire center boundaries. Computing costs on a study area basis, as the Joint Board has suggested, results in little more than maintaining the status quo. Use of the wire center is the right answer for universal service because it allows support to be targeted. It also is the right answer for competition since it removes barriers to entry in high cost areas. Moreover, measuring cost at the wire center ensures that competition will not erode needed subsidies in high cost areas.
7. In an effort to assist the Commission in maintaining a federal fund that is not materially larger than the existing universal service fund while, at the same time, calculating costs based on wire centers, Sprint proposes a three-stepped plan. First, federal support should be available only for wire centers whose costs are 150% or greater than the nationwide average cost per line. Second, initially, only 37.5% of the costs exceeding that threshold should be eligible for federal support. Finally, states will be responsible for funding their internal universal service needs up to an amount equivalent to \$1.00 per access line per month. That is, federal universal service support will be available to companies in a state only to the extent that the support need defined in step 2 above exceeds the amount a state could raise through a \$1.00 monthly charge per access line.
8. Finally, Sprint asserts that certain adjustments to the access charge regime are necessary. In short, interstate access charges must be rebalanced targeting specifically those rates that are now above costs (i.e. traffic sensitive rates). Implicit subsidies must be removed; if done in conjunction with rebalancing, removing these subsidies will minimize the overall size of the universal service fund.

I. THE ACT REQUIRES THE REMOVAL OF IMPLICIT SUBSIDIES

At pages 9 and 10 of its comments, Bell Atlantic charges that “... the terms that were adopted in section 254 do not require elimination of all implicit subsidies or even all implicit subsidies in interstate rates as suggested in the Notice (§126)... There is no free-floating command in section 254 to remove all implicit subsidies from rates or to make all subsidies explicit.” These statements reveal that Bell Atlantic’s reading of Section 254, as well as its view of market realities, is severely skewed.

Sprint asserts that an attempt to foster universal service objectives through implicit cross subsidies (e.g., of local service rates by access or toll rates) clearly runs afoul of Section 254(e). Moreover, to the extent that such implicit subsidies give incumbent local exchange carriers (“ILECs”) an edge over potential entrants (e.g., by permitting – indeed requiring – them to charge below-cost rates for local service), they also constitute a barrier to entry that is precluded by Section 253 of the Act. It may be painful to replace hidden subsidies with explicit USF support programs, but it is nonetheless required both by Section 254 and by the broader policy goal of fostering competition in all telecommunications services.

Sprint will not attempt to theorize just why Bell Atlantic stakes out such an extreme position on this point. Whatever its theory, the recently released decision of the 5th Circuit Court of Appeals reaffirmed Section 254’s mandate, with the Court noting that it was “... convinced that the plain language of Section 254(e) does not permit the FCC to maintain *any* implicit subsidies for universal service support.”¹ (emphasis in original). Importantly, the U.S. Supreme Court, referring to implicit subsidies of universal service in local rates subject

¹ *Texas Office of Pub. Util. Counsel v. FCC*, No. 97-60421 (5th Cir., July 30, 1999) (1999 U.S. App. LEXIS 17941).

to state jurisdiction, has also stated that “ Section 254 requires that universal-service subsidies be phased out... .”²

To the extent that Bell Atlantic does not find the directive contained in Section 254(e) explicit enough to address with certainty its concerns about the need to eliminate *all* implicit subsidies, Sprint asserts that the recent court opinions cited above should provide that certainty. The Commission must, accordingly dismiss Bell Atlantic’s comments on this issue.

II. IT IS APPROPRIATE FOR THE COMMISSION TO ADOPT HOLD HARMLESS

There is no clear consensus among the commenters on the question of the implementation of a hold harmless provision as part of the federal universal service mechanism. Sprint continues to believe that no carrier or state should received less explicit federal high cost support than it receives today. The overwhelming majority of carriers that are high-cost companies today will continue to be high-cost companies following the implementation of the new USF methodology. Consequently, there is no reason – nor was any valid reason supplied by those commenters opposed to hold harmless - to subject these carriers to unnecessary harm during the transition period. Sprint again maintains that the Commission must adopt a hold harmless provision and distribute the funds on a carrier basis.

The reasons offered in opposition to a hold harmless provision ranged from the predictable to the perplexing. In many cases, the reason is transparent, such as the case with those carriers hoping merely to harm high cost incumbents LECs. In certain other cases, commenters do not oppose the concept of hold harmless, but fear that offering hold

² AT&T Corp. v. Iowa Utilities Bd., 119 S.Ct. 721, 737 (1999).

harmless on a carrier basis, as Sprint supports, will increase the size of the fund. In fact, that is not the case. Sprint has analyzed the differences between implementing hold harmless on a carrier and a state basis and finds that there is virtually no variation between the two with respect to the impact on fund size. The following table illustrates the difference in the overall size of the federal fund when hold harmless is calculated at a carrier v. state level:

Costs Calculated at...	Cost Benchmark	State Contribution, \$ Amount Per Line Per Month	Difference in Fund Size: Hold Harmless by State or by Carrier
Study Area	115%	\$0	0.4%
Study Area	115%	\$1	0.2%
Study Area	115%	\$2	0.4%
Study Area	130%	\$0	1%
Study Area	130%	\$1	0.6%
Study Area	130%	\$2	0.8%
Study Area	150%	\$0	1.7%
Study Area	150%	\$1	1.5%
Study Area	150%	\$2	3.8%
Wire Center	115%	\$0	0.1%
Wire Center	115%	\$1	0.0%
Wire Center	115%	\$2	0.1%
Wire Center	130%	\$0	0.2%
Wire Center	130%	\$1	0.1%
Wire Center	130%	\$2	0.1%
Wire Center	150%	\$0	0.2%
Wire Center	150%	\$1	0.1%
Wire Center	150%	\$2	0.2%

As reflected above, in every scenario (using the Joint Board's proposed range of cost benchmarks) the difference in the overall fund size as a result of the adoption of hold harmless at the carrier v. state level is negligible, and in any event always under 5% - and in most cases well under 2%. In fact, in only one scenario is the difference greater than 2% (3.8%).

Because there is no discernable difference, and because of the clear benefits that attend distribution of universal service funds directly to the carriers - chief among them the

ability to ensure that federal funds will go to targeted high-cost areas - the Commission should dismiss entirely the notion of disbursing hold harmless funds on a state basis.

Other commenters, such as the New York Department of Public Service, have clearly lost sight of the overall benefit of hold harmless. While rejecting completely the notion of a hold harmless proviso, New York, at the same time, is concerned that this Commission's proxy model is going to produce skewed results thus causing upheaval in universal service funding (at pages 3-5). What New York fails to see is that it is precisely because the model will not, in all likelihood, be in perfect form upon its introduction that hold harmless is crucial. As Sprint noted in its initial comments, the adoption of carrier-specific hold harmless diminishes significantly any concern regarding the model's readiness. The carrier-specific hold harmless will guarantee that support continues to flow to targeted high-cost areas, regardless of how long it takes to perfect the model and its inputs. Because it is not likely that the model will be flawless on January 1, 2000, the adoption of hold harmless is absolutely critical to the new universal service methodology. However, Sprint is not suggesting it would be inappropriate to remove hold harmless at some point in the future. Sprint agrees with the Commission's stated intent to review the provision in three years, assuming of course, that concerns about the stability of the cost model and inputs have been alleviated.

III. THERE IS NO SUPPORT FOR THE RECOMMENDATION THAT THE SLC BE REDUCED OR ELIMINATED.

Claiming that residential and single line business customers pay too great a share of the joint and common costs of interstate access, the state members of the Joint Board have recommended that the subscriber line charge ("SLC") be reduced or eliminated (at page 2). Similarly, in comments submitted jointly on behalf of the Texas Office of Public Utility Counsel, the Consumer Federation of America, the National Association of State Utility

Consumer Advocates, and the Consumers Union, it is also suggested that the SLC be eliminated. These commenters each reason that the loop is a joint and common facility and as such, its associated costs should be recovered not just through the SLC – which they claim carries too much of the burden currently - but from the IXCs through increases in either the carrier common line charge (“CCLC”) or the primary interexchange carrier charge (“PICC”).

Sprint asserts that the very foundation upon which these commenters base their arguments is seriously flawed. The loop is *not* a joint and common cost nor, as these commenters claim, has this Commission determined that it is. The fact is there is a cost associated with providing the loop and that cost does not vary based on what the customer does with the loop. Consequently, how the customer uses the loop – whether for local or long distance calling – does not impact how the cost of the loop should be recovered. The commenters rationalize that because it is impossible to place a long distance call without use of the loop, the carriers benefit from the loop and thus should pay for the costs associated with the loop. However, like arguments can be made that show just how unsound this seemingly simple argument is. Is it not impossible to watch programming offered by cable television without the benefit of a television set? Yet, no one would suggest that the cost of the set be included in basic cable rates. The point of course, is that the fact that an end user requires a certain device in order to utilize a service does not mean that it is either logical or efficient to include the cost of that device in the cost of the service.

The cost of the loop is a non-traffic sensitive cost and, therefore, Sprint asserts that it should be recovered on a flat-rate basis. Although the creation of the PICC was a positive step in transitioning carrier recovery to a flat rate, it is more appropriate to view the SLC as the correct flat-rate recovery mechanism for the loop. If the Commission is inclined to

make adjustments to the SLC at all, it should follow the advice of Sprint and others in this matter and deaverage the SLC rate.

These commenters are attempting to reverse completely the Commission's direction with respect to the recovery of interstate costs. The Commission must not move backwards on these important issues. On July 29, 1999, the Coalition for Affordable Local and Long Distance Service filed with the Commission a proposal for the reform of interstate access charges, including the SLC, CCLC and the PICC. As a result of the Coalition's filing, the Commission will have the opportunity to discuss these matters in greater detail. It should take that opportunity to declare, once and for all, that the loop is not a joint and common cost and move to an appropriate flat-rate recovery mechanism for costs associated with the loop.

IV. THE COMMISSION SHOULD REJECT AT&T'S PROPOSAL

At page 14 of its comments, AT&T makes a rather curious – and not well-reasoned – proposal. First, it avers that "... carriers should be required to notify their customers that the ILEC has received federal support for their line and that such support is portable to the carrier of the customer's choice." Next, it would require state commissions to "... demonstrate to the FCC that to the extent that carriers within the state have received incremental high-cost support amounts under the new federal forward-looking support mechanism that these funds are being used to reduce local rates... If a state fails to make this showing, the FCC should reduce interstate access charges by the residual amount."

While it is Sprint's policy to provide the customer with all the information he/she requires in order to make informed choices about telecommunications services, it fails to see how AT&T's suggestion will provide anything but mass customer confusion. While, on its face, AT&T's proposal appears to be customer friendly, in fact, such a notice would provide

the customer with little usable information – though it could certainly result in misunderstandings and consumer backlash – which is, perhaps AT&T’s goal. Sprint suspects that, in reality, the idea for the notice is little more than a veiled attempt by AT&T to garner free advertising for its own local services at the expense of the incumbent providers.

From a practical perspective, there are numerous flaws in AT&T’s proposal. First, it is not clear which “carriers” are to provide this suggested notice, but Sprint must assume that “all” carriers includes IXC, CLECs, ILECs and CMRS providers. To the extent the CLEC and CMRS carriers are eligible carriers and have won the customer, however, it is they, not the ILEC, that will be receiving the universal service support. Moreover, why an IXC should be required to provide this type of notice is not at all clear.

Sprint is also puzzled by AT&T’s incorrect assumption that universal service support is to be used to reduce local rates. The Commission has not made such a finding. What the Commission has said on the subject is this: local rates, as they currently exist, are affordable³. Likewise, the Joint Board, on which members of state commissions serve, has made the same declaration⁴. Because local rates are affordable, it makes no sense to use limited universal service funds to reduce them further. It is, however, logical to use USF support to replace the implicit subsidies currently residing in access rates. As Sprint noted in its initial comments in the instant matter, the Commission has recognized that the implicit subsidies that currently exist in intrastate access charges are used to support today’s universal service efforts. Consequently, with the implementation of the new USF mechanism, to the extent a


³ *Federal-State Joint Board on Universal Service*, Seventh Report & Order and Thirteenth Order on Reconsideration in CC Docket No. 96-45; Fourth Report & Order in CC Docket No. 96-262 and Further Notice of Proposed Rulemaking, FCC 99-119 (rel. May 28, 1999) at ¶38.

⁴ *Federal-State Joint Board on Universal Service*, Second Recommended Decision, CC Docket 96-45, (rel. November 23, 1998) at ¶15.

carrier receives support in excess of its current levels of support, it should be required to offset that increase, dollar for dollar, through decreases in intrastate access charges. Failure to take this essential step – or to follow AT&T's ill-advised scheme - would allow the implicit subsidies already residing in intrastate access to remain in place. And, as noted above, Section 254(e) requires *all* implicit subsidies to be eliminated.

AT&T's proposed plan has no merit and no support from other commenters. The Commission should dismiss AT&T's comments without further consideration.

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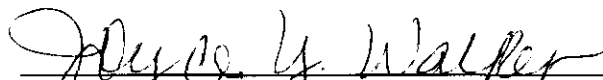
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August 6, 1999

CERTIFICATE OF SERVICE

I, Joyce Y. Walker, hereby certify that I have on this 6th day of August 1999, served via U.S. First Class Mail, postage prepaid, or Hand Delivery, a copy of the foregoing "Reply Comments of Sprint Corporation," In the Matter of Federal-State Joint Board on Universal Service, CC Docket No. 96-45; Access Charge Reform, CC Docket. 96-262, filed this date with the Secretary, Federal Communications Commission, and to the persons on attached list.


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